Work Authorization Statement of Work (SOW)

San Jacinto River Waste Pits CERCLIS No.: TXN00060611 Site ID: 06ZQ

August 2012

The purpose if this Work Authorization issued to the Mississippi Valley Division of the United States Army Corps of Engineers (USACE) under multi-site Interagency Agreement DW96950490 between the Environmental Protection Agency (EPA) and the USACE is to provide a technical analysis and reassessment of the current design and construction implemented for the removal action at the San Jacinto River Waste Pits Superfund Site (Site). The removal action involves the temporary placement of an engineered armor cap above dioxin / furan hazardous waste located along the San Jacinto River. This technical document review will focus on the current design and construction submittals from the Potentially Responsible Party's (PRP's) regarding the Site.

The Site consists of impoundments, approximately 14 acres in size, built in the mid-1960s for the disposal of paper mill wastes and the surrounding areas containing sediments and soils potentially contaminated by the waste materials that had been disposed of in these impoundments. The impoundments are located immediately north of the I-10 bridge and on the western bank of the San Jacinto River in Harris County, Texas. A time-critical removal action was completed in 2011 to stabilize the pulp waste material and sediments within the impoundments to prevent the further release of dioxins, furans, and other chemicals into the environment. The removal consisted of placement of an armor rock cap over a geotextile bedding layer and an impermeable geomembrane in some areas.

The documents included for review in this SOW are:

- "Request for a Time Critical Removal Action at the San Jacinto River Waste Pits Site, Harris County, Texas", dated April 2010, prepared by the EPA,
- "Draft Time Critical Removal Action Alternatives Analysis San Jacinto River Waste Pits Superfund Site", dated May 2010, prepared by the Anchor QEA, LLC,
- "San Jacinto Superfund Site Time Critical Removal Action Methodology for Evaluating Cover Material Sizes", dated May 2010, prepared by the Anchor QEA, LLC,
- "Design Storm Event: San Jacinto Superfund Site Time Critical Removal Action", dated May 2010, prepared by the Anchor QEA, LLC,
- "Revised Draft Time Critical Removal Action Alternatives Analysis San Jacinto River Waste Pits Superfund Site", dated June 2010, prepared by the Anchor QEA, LLC,
- "San Jacinto River Waste Pits Superfund Site Comments on Draft Time Critical Removal Action Alternatives Analysis", dated June 2010, prepared by the Harris County Public Health & Environmental Services,
- "Draft Time Critical Removal Action Alternatives Analysis, dated May 2010 San Jacinto River Waste Pits Federal Superfund Site Comments Harris County", dated June 2010, prepared by the Texas Commission on Environmental Quality,
- "Engineering Evaluation Proposal TCRA Alternatives Analysis San Jacinto River Waste Pits Superfund Site", dated June 2010, prepared by the HVJ Associates,

- "RE: San Jacinto TCRA Alternatives Analysis," dated June 2010, prepared by Michael Hasen HVJ Associates,
- "San Jacinto River Waste Pits Superfund Site Comments on Draft Time Critical Removal Action Alternatives Analysis", dated July 2010, prepared by the Harris County Public Health & Environmental Services,
- "Decision Document for the Time Critical Removal Action at the San Jacinto River Waste Pits Site, Harris County, Texas", dated July 2010, prepared by the EPA,
- "Final Decision Dispute Resolution Regarding EPA's Decision for a Temporary Cover Designed for a Storm Event with a Return Period of 100 years to Address the Time Critical Removal Action at the San Jacinto River Waste Pits Superfund Site Administrative Order on Consent for Time Critical Removal Action CERCLA Docket No. 06-12-10 San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas" dated October 2010, prepared by the EPA,
- "Draft Removal Action Work Plan San Jacinto River Waste Pits Superfund Site", dated September 2010, prepared by the Anchor QEA, LLC,
- "Final Removal Action Work Plan San Jacinto River Waste Pits Superfund Site", dated November 2010, prepared by the Anchor QEA, LLC,
- "Final Removal Action Work Plan San Jacinto River Waste Pits Superfund Site", dated February 2011, prepared by the Anchor QEA, LLC,
- "San Jacinto River Waste Pit Superfund Site Time Critical Removal Action Summary of RAWP and Schedule Revisions CERCLA Docket No. 06-12-10," dated February 2011, prepared by Anchor QEA, LLC,
- "San Jacinto River Waste Pit Superfund Site Time Critical Removal Action Detailed Schedule Submittal CERCLA Docket No. 06-12-10," dated February 2011, prepared by Anchor QEA, LLC,
- "EPA letter regarding request to change work plan and work schedule Administrative Settlement Agreement and Order on Consent for Removal Action, CERCLA Docket No. 06-12-10 Time Critical Removal Action Schedule San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas," dated March 2011, prepared by EPA,
- San Jacinto TCRA Construction Submittals
- San Jacinto TCRA Construction Daily Reports
- San Jacinto TCRA Construction Weekly Reports
- "Request for formal response to concerns about displacement of waste sludge due to construction related activities implementing the Time Critical Removal Action, CERCLA Docket No. 06-12-10 Time Critical Removal Action Work Plan Schedule San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas," dated April 2011, prepared by EPA,
- "San Jacinto River Waste Pits Superfund Site Proposed Path Forward Western Cell," dated May 2011, prepared by Anchor QEA, LLC,
- "Revised Final Removal Action Completion Report San Jacinto River Waste Pits Superfund Site," dated May 2012, prepared by EPA,
- "Post-TCRA Quarterly Inspection Report January 2012 Inspection," dated February 2012, prepared by Anchor QEA, LLC,
- "Memo: First quarterly cap inspection for San Jacinto River Waste Pits superfund site," dated February 2012, prepared by EPA,

- "Post-TCRA Quarterly Inspection Report April 2012 Inspection," dated May 2012, prepared by Anchor QEA, LLC,
- "Memo: Second quarterly cap inspection for San Jacinto River Waste Pits superfund site," dated May 2012, prepared by EPA,
- "Time Critical Removal Action (TCRA), Quarterly Monitoring Maintenance Requirements Report," dated July 2012, prepared by Anchor QEA, LLC,
- "San Jacinto River Waste Pits Superfund Site Time Critical Removal Action TCRA Cap Repair Plan CERCLA Docket No. 06-12-10," dated July 2012, prepared by Anchor QEA, LLC,
- "RE:San Jacinto River Waste Pits Superfund Site Time Critical Removal Action TCRA Cap Repair Plan CERCLA Docket No. 06-12-10 San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas," dated July 2012, prepared by EPA,
- "Memo: Western berm inspection of armor cap at the San Jacinto River Waste Pits superfund site," dated July 2012, prepared by EPA,

These administrative, design, and construction documents provide the necessary information to provide a through technical review. The review will focus on identifying any deficiencies, errors, issues, or concerns of the selected removal action.

REQUIREMENTS

- 1. Perform a technical review and prepare comments, including identification of problem areas and any necessary revisions, on the PRP's draft and final design and construction documents to ensure that the reports are technically valid and satisfy the goals for this work.
- 2. Communicate at least weekly with the EPA Federal On-Scene Coordinator (OSC) regarding progress and issues identified during the report review.
- 3. Maintain all technical and financial records associated with this Work Authorization.
- 4. Prepare and submit monthly progress reports and invoices to document monthly and cumulative cost, performance status, and technical progress.

DELIVERABLES

- 1. Submit progress reports and invoices to the EPA OSC for each month no later the 15th day of the following month.
- 2. Submit review comments on the draft and final design and construction documents such as EPA Decision Document, Removal Action Work Plan, and Removal Action Completion Report within three weeks of initiation of this Work Authorization, or by November 30, 2012, whichever is later.
- 3. Submit comments on draft and final such as design documents, EPA Decision Document, Removal Action Work Plan, and Removal Action Completion Report, within 3 weeks of receipt of the final report.

PERIOD OF PERFORMANCE

It is anticipated that this Work Authorization will cover a time interval of approximately 6 months, or until February 28, 2013.